Paul M. Ferder, OSB No. 72087 Ferder Casebeer French & Thompson, LLP 515 High Street SE PO Box 843 Salem OR 97308 (503)585-9197 pferder@ferder.com

Of Attorneys for Defendant

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,  Plaintiff,  v.  HUGO BARRON-SONORA,	No. 3:13CR00347-MO SENTENCING MEMORANDUM
Defendant.	

### I. Introduction

On June 9, 2014 at 11:00 A.M., Mr. Barron-Sonora will appear before the court for sentencing in this matter. On February 3, 2014, Mr. Barron-Sonora entered, and the court accepted, a guilty plea to Felon in Possession of a Firearm, 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(a)(2) (Count 1) and Conspiracy to Distribute and Possess with Intent to Distribute more than 100 grams of Heroin, 21 U.S.C. § 841(a)(1), 21 U.S.C. § 841(b)(1)(B), and 21 U.S.C. § 846 (Count 2). At sentencing, the government will request the court sentence Mr. Barron-Sonora to 97 months at the Federal Bureau of Prisons (BOP). Mr. Barron-Sonora, however, will request a 63 month sentence, with a special request for recommendation to specific placement at FCI-Sheridan, with eligibility for any and all non-residential and residential drug

and alcohol intervention programs (DAP and RDAP) and continuing educational programming (ACE).

## II. Background

Mr. Barron-Sonora was born on April 22, 1981, in Tepic, Nayarit, Mexico, and is the fourth of five children born to Irma and Humberto Barron-Sonora. Mr. Barron-Sonora attended primary school in Mexico, but only obtained a sixth grade education. His failure to complete any additional schooling is directly attributable to the impoverished conditions Mr. Barron-Sonora was raised in. At age twelve, Mr. Barron-Sonora started working full-time hours to support his family. As an adolescent, Mr. Barron-Sonora worked as a butcher. He also sold gum and other small candies on the street in order to support his family. Mr. Baron-Sonora quickly realized that Nayarit presented minimal economic opportunity and offered no chance of upward social mobility. Consequently, in his quest to find meaningful work, Mr. Barron-Sonora entered the United States unlawfully as a young adult.

Mr. Barron-Sonora spent five-years working as a butcher in California. He continued working in that capacity after relocating to Oregon. As is often the case for undocumented laborers, Mr. Barron-Sonora's working conditions were less than desirable. Substandard wages also made it difficult for Mr. Barron-Sonora to support himself and his family. At some point, Mr. Barron-Sonora began buying and selling cars to supplement his income. In fact, at the time of his arrest, Mr. Barron-Sonora was earning approximately \$1,200 to \$2,000 per month by buying and selling cars. But, despite his best efforts, Mr. Barron-Sonora still had difficulty making ends meet.

Eventually, Mr. Barron-Sonora began selling narcotics. Although, initially, he sold small quantities of narcotics, by the time of his arrest, Mr. Barron-Sonora was selling about 25-30 ounces of heroin a week.

Mr. Barron-Sonora is married to Esmeralda Colmenares-Chiprez.

Colmenares-Chiprez, although not condoning of her husband's actions, will remain a viable support for him. The couple met in 2009. At that time, Ms. Colmenares-Chiprez was already the mother of three daughters: Gisselle (15), Julyssa (11), and Annelisse (9). Mr. Barron-Sonora has assumed the role and responsibilities of a father from the instant he entered his stepdaughters' lives. Until he was arrested, Mr. Barron-Sonora supported the girls financially and served as a proper male role model. Then, in 2011, the couple gave birth to Humberto, Mr. Barron-Sonora's first biological child.

The birth of Humberto sparked a true change in Mr. Barron-Sonora. In fact, in 2011, Mr. Barron-Sonora undertook steps to obtain legal status. Mr. Barron-Sonora's effort to obtain a valid work permit was predicated upon his desire to quit selling narcotics and work a legitimate job. Ironically, one week after his arrest, Mr. Barron-Sonora was issued a valid work permit.

Mr. Barron-Sonora's extenuating personal and family circumstances merit leniency. Mr. Barron-Sonora suffers from diabetes and is in need of ongoing treatment. His diabetes caused him to be hospitalized in 2013. Mr. Barron-Sonora experiences chest pains, shortness of breath, and lightheadedness. His diabetic condition requires regular, continuing, ongoing treatment and medication. Moreover, Mr. Barron-Sonora is the sole financial provider for his four children, his wife, his parents, and siblings.

In terms of Mr. Barron-Sonora's criminal history, the record is sparse. In 2007, he was, however, convicted of misdemeanor-DUH in California. Also, in 2009, Mr. Barron-Sonora was convicted of first-degree Possession of a Forged Instrument in Multnomah County Circuit Court.

Although Mr. Barron-Sonora appreciates the gravity of his conduct, the attached letters make clear that he is much more than a felon. Mr. Barron-Sonora has made a positive impact on many people from all walks of life.

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## III. Guidelines Calculations

The guideline for violations of 18 U.S.C. § 922(g)(1) is found as USSG §2K2.1. Pursuant to USSG §2K2.1(a)(4)(B), if the (i) offense involved a semiautomatic firearm that is capable of accepting a large capacity magazine; and (ii) defendant was a prohibited person at the time the defendant committed the instance offense, the base offense level is 20. Both of those factors apply in this case.

In addition, the established guidelines for violation of 21 U.S.C. § 841(a)(1) is found at USSG §2D1.1. The instant offense involved between 1,000 and 3,000 grams of heroin. Thus, under USSG §2D1.1(a)(5) and (c)(4), the base offense level is 32. Defendant agrees with the government and the Presentence Report (PSR) that he should receive a 3 level reduction under §3E1.1 for acceptance of responsibility. That results in a total offense level of 29.

Defendant does agree that Chapter 5, Part A, establishes that defendant has 2 criminal history points, establishing a Criminal History Category II. According to those calculations, defendant would agree that the appropriate sentencing guideline range, without departures or variances, would be 97-121 months. Defendant notes that, given (1) his criminal history, (2) the quantity of heroin possessed, and (3) that this is defendant's first felony drug conviction, the court is required to impose a mandatory-minimum 5 year sentence. 21 U.S.C. §841(b)(1)(B)(i).

Defendant further agrees with the government's proposed two-level downward variance to recognize defendant's early resolution of this matter, and to achieve a reasonable sentence in light of that early resolution under the factors listed in 18 U.S.C. § 3553(a). Although that downward variance would result in a total offense level of 27, defendant understands the government will seek a two-level upward adjustment in the offense level based upon the government's belief that defendant played an aggravating role in the offense, USSG §3B1.1.

Defendant objects to any upward adjustments, but understands that the government will recommend an adjusted offense level of 29. That offense level carries a presumptive guideline

range of 97-121 months. In addition, the government agrees to recommend a sentence at the low-end of the resulting guideline range and will not seek any other upward departures, adjustments or variances to the advisory guideline range. Although the PSR indicates that a multiple-count adjustment may apply, USSG §3D1.1, defendant notes that §3D1.2(d) provides that both convictions "are to be grouped."

Defendant, for his part, objects to the government's recommended two-level upward adjustment from an adjusted offense level of 27. Defendant further requests an additional two-level downward variance due to defendant's extenuating circumstances; to wit, his need for ongoing medical treatment and familial obligations. Accordingly, that results in an adjusted offense level of 25.

### IV. Section 3553 Factors

In *United States v. Booker*, 543 US 220 (2005), the United States Supreme Court made clear that the federal sentencing guidelines are advisory, and this court, when sentencing a defendant such as Mr. Barron-Sonora should also consult the criteria outlined in 18 U.S.C. § 3553(a). This court, like all district courts, has historically been in the position to "consider every convicted person as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and punishment to ensue." *Koon v. United States*, 518 US 81, 112 (1996).

A "reasonable" sentence consists of considering the presumptive sentence provided for under the guidelines, along with other unique factors to the case. After considering the guidelines sentence, this court may decide that the guideline sentence should not apply because "the case at hand falls outside the 'heartland,' \* \* \* perhaps because the Guidelines sentence itself fails to properly reflect § 3553(a) considerations, or perhaps because the case warrants a different sentence regardless."

Rita v. United States, 551 US 338, 351 (2007). This court has discretion to vary from the guidelines based solely on policy considerations, including disagreements with the guidelines.

Kimbrough v. United States, 352 US 85 (2007).

Under 18 U.S.C. § 3553(a), this court should "impose a sentence sufficient, but not greater than necessary" to comply with the goals of sentencing identified by Congress. In particular, this court should consider: (1) the nature and circumstances of the offense and the history and characteristics of the defendant; (2) the goals of sentencing: punishment, deterrence, protection of the public, and rehabilitation of the defendant; (3) the kinds of sentences available; (4) the recommended sentence under the sentencing guidelines; (5) any pertinent USSC policy statements; (6) the need to avoid unwarranted disparities among similar defendants; and (7) the need to provide restitution to victims.

In this case, the PSR accurately describes Mr. Barron-Sonora's relevant conduct, criminal history, and familial situation. Even though others were mentioned in the reports, and associated with the substances involved, Mr. Soto chose not to challenge any aspect of the charges against him concerning his "relevant conduct," including any challenges to government action in any of its investigative efforts, exemplifying "extraordinary acceptance of responsibility." *United States v. Severino*, 454 F3d 206 (3<sup>rd</sup> Cir 2006).

Removing Mr. Barron-Sonora for more than five years—more than an eighth of his entire life—will certainly punish him, deter any similar future action, and protect the public.

However, it will not provide rehabilitation, unless that rehabilitation begins before release. This is evident based solely on a review of Mr. Barron-Sonora's history of substance abuse. Without intensive drug and alcohol rehabilitation before release, Mr. Barron-Sonora will certainly fail as his past reflects. Thus, removing Mr. Barron-Sonora from society for more than five years, while at the same time recommending his entry into the DAP program and RDAP program during his incarceration will certainly provide Mr. Barron-Sonora the foundation from which to begin to rebuild his life before he is released. As indicated *supra*, much of Mr.

Barron-Sonora's involvement with drug trafficking was intimately related with his own addiction

issues. Entry into the DAP and RDAP program will help ensure that he will not re-offend and will be able to continue playing a meaningful role in the lives of his children. If the court adopts Mr. Barron-Sonora's sentencing recommendation, he will be released with more than five years of sobriety under his belt.

Structuring an appropriate federal sentence in this fashion provides for approximately 41 more months, without departures, from an equivalent state sentence. *See* ORS 475.850 (based on defendant's criminal history and a substantial quantity of heroin the presumptive sentence would be 21-22 months). But, more importantly, Mr. Barron-Sonora the intervention he desperately needs before his release. As this court is aware, had Mr. Barron-Sonora been sentenced in state court, he would not have access to similar treatment programs. Mr. Barron-Sonora looks forward to the opportunity to pay his debt to society while, at the same time, rehabilitate himself. That rehabilitation starts with a DAP or RDAP program.

Further, as noted, Mr. Barron-Sonora has only completed six years of formal education.

FCI-Sheridan provides adult education opportunities, including limited in-house college programs. Furthering his education will only provide the tools necessary to enhance Mr. Barron-Sonora's chances for future success. There is no question that defendant is an intelligent man. However, formal education opportunities will help focus Mr. Barron-Sonora's time and attention to lawful activities that confer a benefit to our society.

In this case—a case where a young man, from an impoverished childhood, turned to unlawful activity to make ends meet and support his extended family—and for reasons discussed above, an appropriate sentence should entail 63 months incarceration within the BOP with recommendations for placement at FCI-Sheridan, and placement in the DAP and RDAP, and ACE programs therein. That sentence takes into account the guidelines sentence, the §3553(a) factors, defendant's acceptance of responsibility, the early resolution of this case, and the concept that "imprisonment is not an appropriate means of promoting correction and

rehabilitation." 18 U.S.C. § 3582.

Adopting the government's recommendation—97 months—will not achieve any additional penological or societal interests than what would be captured in defendant's recommended 63 month sentence. That additional 34 months will not confer any additional benefit to American taxpayers or to defendant's rehabilitation. In fact, the government's recommendation, if adopted, will only saddle defendant's family with more debt and deprive defendant's children from a father that plays an active role in their lives. Moreover, the government's recommendation relies upon a 2-level upward adjustment that should not apply in this case. To help guide the court in reaching an appropriate incarceration term, defendant has attached a sentence comparison chart. That chart contains a list of similarly situated defendants sentenced for similar crimes in the District of Oregon.

A 63-month sentence is sufficient, but not greater than necessary. Defendant prays that this court adopts his recommendation.

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V. Conclusion

For those reasons, Mr. Barron-Sonora recommends that the court sentence him to 63 months incarceration with the Federal Bureau of Prisons. That sentence derives from a total offense level of 29, in crime Category II, along with the government's recommended two-level downward variance in light of defendant's early resolution, and defendant's request for an additional two-level downward variance premised upon Mr. Barron-Sonora's extenuating circumstances. The low-end of that category is 63 months. Defendant requests that the court adopt that recommendation as an appropriate sanction and rehabilitative effort to make Mr. Barron-Sonora a productive member of society once again.

Dated this day of May, 2014.

FERDER CASEBEER FRENCH & THOMPSON LLP

/s/ Paul M. Ferder PAUL M. FERDER, OSB# 72087 Of Attorneys for Defendant

### CERTIFICATE OF SERVICE

I hereby certify that I directed to be served the foregoing "Sentencing Memorandum" on:

Pamala R. Holsinger Assistant United States Attorney U.S. Department of Justice 1000 SW Third Avenue, Suite 600 Portland, OR 97204

by the following indicated method or methods:

X by mailing full, true, and correct copies thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorneys as shown above, the last-known office address of the attorneys, and deposited with the United States Postal Service at Salem, Oregon, on the date set forth below.

by emailing a full, true, and correct copy thereof to the attorney as shown above, which is the last known email address for the attorney, on the date set forth below. It appears that receiving email address received this document on the date set forth below.

DATED this 27<sup>th</sup> day of May, 2014.

FERDER CASEBEER FRENCH & THOMPSON, LLP

/s/ PAUL M. FERDER
PAUL M. FERDER, OSB #72087
Of Attorneys for Defendant

Dear: Judge

Would you Please let my dad out because he always helps, me With my homework. He would always Play with us and my little brother. My Sisters and I liked it When he was here. He Would Olwys: Pick's us up from School, When my mon worked and I like When my dad watches us Please, Please let him out. nenis chel Judge mom dad Beto

EXHIBIT 101 PAGE 1 OF 1

to the Judge Dear Judge Hello MR. Judge my name is annelvese I am a yearse old I Im Pitting this to say that we all want my dod to come back we all pray hard super hard but the dream Won't come the so preas pleas oconnh pleas let him out we all beg you if it comes true thanky on so much. We always Play Soccer, he picks us up From School not engmore we walk home so pleas PIEGS 1et him out Soon or now so we mostley sometimes She works hand for money to go see him and to bye food. So you now why we wont him.

EXHIBIT 102 PAGE 1 OF 1

Dear judge, my name Gisselle Chiprez. 1 am Hugo sonora's oldest step-daugnt. I miss my step dad a lot... I know he didn't make very good desions while out here but everyone makes mistakes right? And when we make those mistakus we learn from thum. I think my step dad has. I also think he deserves a second chance to prove that. Things here at home have been hard without him. I hardly get to see my man because shis so busy working about trying to keep a root over our heads. My mother is doing a great jub considering there's four OF Us shi's supporting. But it would be so much better IP he were here. We all miss and ruld him. This family isn't guite the same without him. so it you Could please give him a second chance that would thuan a lot we ruld him. -gaselle C.

## Dear Judge,

## 5/25/14

My name is Esmeralda Colmenares I am the Wife of Hugo Sonora Barron, we have one son together who in october will be turning Hyrs old this will be the second birthday in Which my husband is not with us, I also have three girls who have Come to see Hugo as their father.
Your honor my husband is not a load person, he is a good man who always and for most put his family first, he is the type of person who will always put other people's needs before his, he is always willing to tend a hand Without expecting anything in return. I know and understand that this is a serious matter this has been really hard on my kids and I, Emotionally and Physically, It hurts me to see my kids hurt so much as well as myself, I believe in the fact that we all deserve a Second Chance although my husband did not make the best

EXHIBIT 104 PAGE D OF 2

May 26, 2014

To whom it may concern,

My name is Alma L. martinez, I am writing in support of my brother in law Hugo Sonora Barron who is married to my sister and is father to my nephew Humberto and step dad to my three nieces who he treats and loves as his own. I really hope that by the end of all these letters you find it in your heart to help out my sisters family by seeing that Hugo has a heart and loves his family as well as is loved.

I've known Hugo for four and a half years and in that time he's shown to be a family man. Whenever I would go visit them on weekdays, he would make sure the girls did their homework and would even sit down with them at the dinner table and help them out. They always had plenty of books and puzzles to keep them entertained in an educational and fun way. As for my nephew, he always made sure he spent quality time playing or just sitting down watching cartoons.

My sister, nieces and nephew miss him very much and well it pretty much goes without saying that my nephew has been a daddys boy from day one as he is Hugo's first baby, so for him losing his dad from one day to the next was especially hard on him. I grew up without my father and I can say from experience that it makes a big difference. Especially when the father is so active in the childrens lives like Hugo was. For my sister, having her husband by her side is an invaluable token needed to help make decisions for their family now and in the future. Having both parents in your life really helps set you up for a more successful life full of triumphs.

I know he's made some mistakes but he's human, there is no one perfect person out there. We live, we make mistakes and we learn. Sure we put ourselves in situations that are hard to come out of but we deserve a second chance to be able to show that although we have our faults, we are able to change for the better, rise, learn and make better conscious decisions.

I believe in my heart that with the love he has for his family and the pain both he and his family have been enduring with their separation that he has learned his "lesson" and will do whats right to help his family move on in a way thats dignified while setting a prime example especially to his son and to the community in which he will reside.

Please grant him the opportunity to redeem himself and make a better future for him and his family. Please grant him this opportunity of a second chance and show that he is worthy. Thank you very much for your valuable time and hopefully opening up your heart to help a family truly in need of being put back together.

Thank you,

Alma L. Martinez

May 25,2014

To whom it may concern,

My name is Alejandro Martinez Jr. I am currently a Shift Leader at Columbia Steel Casting Co. Inc. I am writing this letter in support of Hugo Sonora Barron. I have known Hugo for a little over four and a half years, as he is married to my sister in law.

Hugo is a dedicated family man and looks out for his son Humberto and three stepdaughter's best interests. He also makes sure his kid's health is a priority. With him out of the picture his kids and wife have begun to experience depression and stress as he is considered part of the foundation of their family. All of this has also affected them significantly emotionally, mentally and socially. If Hugo is forced to be away from his family it will be very difficult as the kids and his wife will struggle without him. He helps out around the house whether it is chores or helping the girls out with schoolwork, not to mention valuable father and son time with Humberto, overall a valuable member of the family. With Hugo being absent for a significant amount of time he will miss out on watching over the kids and his wife as well as watching them all grow up.

I know life is not easy and we all try to look for easy ways to solve problems and along the road we call life we all make decisions that affect us either positively or negatively. Though we try not to live with regrets, we all have them, but we can't move time backwards, we can only hold our head up and move forward. I believe its just human nature to not always make the right decision but the easy one.

This being said, I hope you greatly consider making Hugo Sonora Barron, who is a dedicated and loving family man, a contributing member to our society. I have full faith and confidence that he will not disappoint as he puts his family first and will strive to set the proper examples for his four kids.

Sincerely, Alejandro Martinez Jr

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EXHIBIT 106 PAGE 1 OF 1

Dear Honorable Judge,

5/20/14

My Name is Crystal Jimenez I am 30 years old, and I am a district Manager. I have known Hugo for 5 years, he is my brother in law and is married to my sister Esmeralda. In the time that I have known Hugo I have known a loving caring husband. Concerned, loving, and funny Dad to my 4 nieces, and nephew. This has been a hard situation to live for my sister and her family. All the unknowns that await them alone have taken a health toll on both my brother in law Hugo and Sister. The children have suffered too, since my sister is working longer hours to keep up with the house expenses. I have substituted at parent/teacher meetings my two elementary age nieces have dropped in grades, Annelisse has shown signs of depression, she cry's easily when they ask her for her dad, since he would walk them daily to school and pick them up.

Hugo comes from poverty, has a US born I don't know the struggles he and my husband lived in Mexico, or do I know the feeling of being hungry, but I do know that he had no choice, I saw the struggle of him trying to find work, and seeing the letdown time and time again. Meanwhile the situation back home got worst.

I'm hoping you can see past the charges he is being charged with, and see the husband, father who he really is.

I know that my nieces need him, I am a child of divorce and I know what the separation can mentally do to a young girl. The girls need a father figure, they want a father figure, Hugo took on that role and was very good at it. My nieces were the happiest I had ever seen them. My nephew doesn't understand what is going on, and doesn't understand why his daddy can't come home with them when they go visit him. He often tells him, open the door hug me, I miss you.

I know and understand the severity of the charges presented against Hugo, I know that he had no other option when it came to surviving. I know that the headlines now are almost always of the bad, evil behind these types of crimes, but I promise you that Hugo is none of these statistics, he honestly was a hungry man, with a heavy burden to feed his family in Mexico and to care for his wife, and 4 children here. He applied to many jobs, but all wanted or needed papers he did not have. Hugo is a good man, with a kind heart, please give him the chance to reunite with his family. My nieces Gisselle, Julyssa, Anneliese, and Humberto would be grateful for an eternity.

Crystal Jimenez

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Salem, OR

EXHIBIT 107 PAGE 1 OF

Dear Honorable Judge,

5/20/14

My Name is Jose Mario Jimenez Castillo, I am 29 years old, and for profession I am a Roofer. I have known Hugo Sonora Barron for about 5 years. Hugo is a family man. Hugo has a family of 5 here who he has left alone and vulnerable. I was once a Mexican immigrant and I lived the struggle Hugo lived, it's not easy coming to a new country escaping poverty, crime, corruption. You leave the only home you know for necessity, like many of us, Hugo had no choice, his family in Mexico was starving, and unlike me he had an ill father. As only single male of the family he was the one who had to come and help his family of 6. I was fortunate to have 2 older brothers here, I arrived the US to a secure home, and work was already waiting for me. Hugo wasn't so lucky, his struggle continued, the situation at home continued, and got worse, the drug cartel started to fight in his city, there were innocent people dying daily, during this time Hugo really tried to find work, but it's not easy, the money is minimal, labor is hard, and the money was never enough to meet his family's needs. During this time Hugo met my sister in law Esmeralda, she already had 3 beautiful daughters, Esmeralda became pregnant with Hugo's son and this added to his financial obligations. Hugo took on his role has father figure to these girls, as if he was always there, the girls got attached to him, as he did to them. As a father I know the importance of daily interaction with your children, our society has its own way of raising our children, making them into spoiled, disrespectful kids. Parents have to keep them in line 24/7. This is now difficult for this family, their family is broken.

Please look past the desperate decision Hugo had to make, he really had no choice, his family was not going to survive in Mexico. He alone carried the burden to feed 12+ mouths, this is not easy for anyone. Hugo is a really nice, funny, caring, and humble man. He is always lending a helping hand. I beg you please allow him to come home, his family needs him. Do not allow Gisselle 15, Julyssa 11, Annelisse 9, Humberto 3 grow up without a father figure, they need his guidance, and love. His wife Esmeralda needs his love and support, as head of house hold we have seen her worries, stress, increase, and her health decrease, she has anxiety, depression. She is trying to stay afloat and keep it all together, but she cannot alone.

Hugo was the strength of this family and the one in Mexico. I ask that you not judge him on a time frame were he made the only decision he could make based on the opportunity's he had to keep his family alive. But look at the family man that I know, the husband, father, son, and brother, neighbor who was always helping others, aware of the struggle and always remained true to his roots.

I know his crime cannot go unpunished, but I pray that you find it in your heart to be lenient and give Hugo and his family to reunite soon.

Thank you for your time.

Jose Mario Jimenez Castillo

5030 Mouris Jimenez C.

Salem, OR

EXHIBIT 108 PAGE | OF |

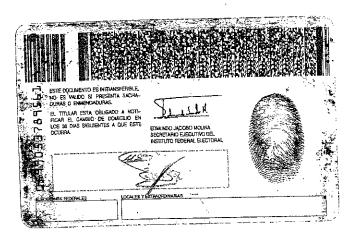
D QUIEN CORRESPONDS

18/760/14

POR MEDIO DE LA PRESENTE HOGO CONSTAR QUE CONOSCO SL C! HUGO EDUARDO SONORA BARRON DESDE HOGE APRO KINDAMENTE ES DIOS STENDO DMIGOS DESDE LA JUFANCIA.

DE IGUST FORMS RECONOSCO QUE ES UM PERSONS
RESPONSABLE Y TRABAJO DORO DESDE CHICO SIEMPRE FUE
UN A PERSONS QUE TRABAJO DARA LA LIR A DEBUTE EN
SUS METAS PERSONALES, ASI COMO EN LAS 20BORABLES
UNA PERSONA DALIGABLE Y QUERIDO POR TODOS SUS
AMIGOS.







February 18, 2014

To whom it may concern:

I am giving my honest word that I have known Mr Hugo Barron Sonora for about 28 years. We have been friends since day one.

I recognize that in the same way he is a responsible and hardworking person since childhood.

Was always a person who worked to succeed in their personal goals as well as working and was always a friendly person and loved by all his friends.

Sincerely,

Jose Soto-Mayorga

A QUEN CORRESPONDA:

19/148/2014.

PLEONOZCO: POR MEDEO DE LA PRESINIE. CONOCER

AL SR. HUGO, EDUANDO SONORA BARRON. ADALLEMAMMENTI.

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DELLA SZEMPRE TRABATO PARA BZÉN EN ALGUNAS.

CANNZCELEAS DE LA CZUDAD; SZENDO UNA PERSUNA.

TRABATADORA, BUEN HIJO, Y BUEN AMZGO. HE CUAL

HASTA LE MOMENTO SE LE TEENE APRECIO, Y ESTEUR.

POR PARTE DE LA COMUNZOAD. AGRADE CZENDOLE

SU ATENCION, Y ESPERANDO REPLEZE EN LOTEDES

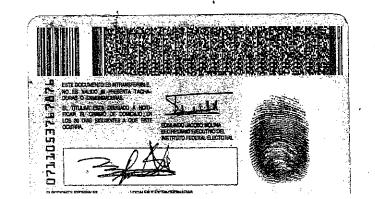
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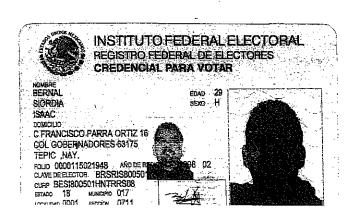
AMZGO HUGO, DENTRO DE TUDOS NOSOTROS

ATANTAMEN TE.

ISAAC BERNAL SICRDIA.

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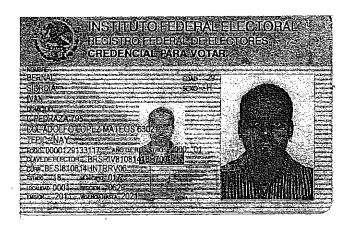
February 19, 2014

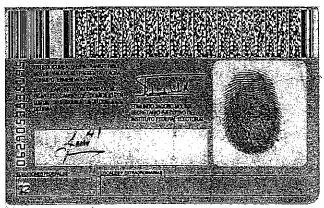
To whom it may concern:

I have known Mr Hugo Barron Sonora since approximately the year 1991. I've known him to have always been a great worker in various meat stores in the city. He is a great hard worker, good son and friend. As a part of the community it is my honor to be able to write about him. I would like to express to you all what a great member of the community he is to us and we all here miss him greatly.

Sincerely,

Isaac Bernal-Siordia





## A QUEN CORNES PONDA:

POR MEDIO DE LA PRESENTE HAGO CONSTAN QUE CONOCIO PRENAMENTE

AL C. HUGO EDVALDO SOUCHA BARRON APROXIMADAMENTE

DESDE EL AÑO DE 1991. CON EL CUML FORME UNA GRAN AMISTAD

YA QUE ES UNA MUY BUENA PERSONA, RESPONSABLE CON SU TRABAJO

Y MUY APEGADO A SU FAMILIA. SOLO PODEIA DECIR COSAS BUENAS

DE SU PERSONA YA QUE ESTOY MUY AGRADECIDO CON LA AMISTAD QUE

TENEMOL. ESPERO QUE MUY PRONTO ESTE DE REGIRESO CON SU FAMILIA Y

AMISTADES QUE LO QUERENOS.

MUCHAS GNACIAS POR SU ATENCION PRESTADA Y APROVECAD PARA ENVIANCE UN COPPIAL SALUDO.

ATTENTAGENTE IVAN BERNAL STORAGE

EXHIBIT II PAGE OF 2

To whom it may concern:

Through this I affirm that I am pleased to say that I have known Hugo Eduardo Sonora-Barron from approximately 1991. In every form he is a great friend and a wonderful person, responsible with his work and very attached to his family. All I can say is good things about him personally and I am very fond of our friendship that we have. I hope he is able to rejoin his family and friends who love and care for him a lot.

Thank you for you attention and time to read my letter.

Sincerely,

Ivan Bernal

Tepic, Nayarit

18 défebrero de 2014

A quien corresponda:

yo Cristina Gabriela Sonora B. Pido a usted consideración por mi hermano el Sr. Hugo Eduardo Sonora B. preso en el Estado de Oregon; venimos de una familia honesta y muy trabajadora, el es muy responsable y de muy nobles sentimientos Sobran palabras para describir a una per Sona que siempra da su máximo apoyo. Sin dejar atras que su esposa y sus 4 hijos además de que dependen de el, lo necesitan mucho pues son pequeños aun. Mis padres no puden ir a verlo pues su Salud no es la más adecuada para viajar Con esto pretendo sencibilizarlo a Usted pues todos cometemos errores, más es de huma corregirlos. Le envio un saludo cordial y espero su respuesta sea favorable para mi herman INSTITUTO FEDERAL ELECTORAL GYACIOS

CREDENCIAL PARA VOTAR

NOMBRE
SONORA EDAD 34
BARRON SEXO M

CRISTINA GABRIELA

DOMICILIO
C DELFIN 14
COL ADOLFO LOPEZ MATEOS 63821
TEPIC, NAY.
FOLIO 0000112297484 AÑO DE REGISTI.
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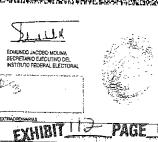


afte. Cristina Sonora

ESTE DOCUMENTO ES INTRANSFERIBLE.

INO ES VALOS SI PRESENTA TACHADURAS O DIMENDADIDAS.

EL TITULAR ESTA OBLIGADO A NOTIFICÂR EL CAMBIO DE DOMOCILO EN
LOS 36 DAS SIGUIENTES A CUE ESTE
OCURRA.



February 14, 2014

To whom it may concern:

I Cristina Gabiela Sonora Barron ask you consideration for my sr brother Hugo Barron Sonora in the state of Oregon, we come from an honest and hardworking family, is very responsible and very noble sentiments too many words to describe a person who always give their maximum support. Without leaving behind his wife and 4 children in addition to be dependent, need much as they are a small. My parents did not go and his health is not the most suitable for traveling. With this I intend sincerely to you as we all make mistakes, but human is correct. I send warm greetings and I hope your answer is favorable to my sister. Thank you.

Sincerely,

Alma Isavra Sonora-Barron

## Topic, Nayarit a 19 de Febrero del 2019.

A quien corresponda:

\*\*\*

Por medio de este conducto y con al respeto que se merecen me diryo a ud. (uds.) para hacer de su co-noamiento que mi hermano Hugo Eduardo Donora Barrón, es uno persona tranquila, honesta, respetuosa y nada problemática.

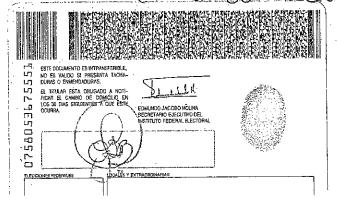
Desde niño demostró su interés por salir adelante pues desde los 10 años empezó a trabajar y hacerse responsable desu persona, logrando con ello abrirse puertas en su camino a trabajos con mucha responsabilidad.

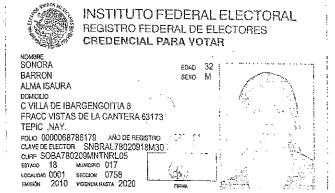
Tué aducado con valores, venimos de una familia senalla y trabajadora por lo que les ruego consideren ou mi harmano pues tiene 4 niños y esposa que dependen ole él.

De antemano muchismas gracias por la atención prestada y quedo de ustedes.

Alma Isaura Barran Barran

EXHIBIT 113 PAGE \_ OF 2-





February 14, 2014

To whom it may concern:

Through this conduit and with the respect they deserve I am writing to let you know that my brother Hugo is a calm, honest, respectful and nothing problematic person.

Since child I showed your interest to get ahead because since 10 years he started to work and take responsibility for his person, thereby achieving our open jobs on his way with a lot of responsibility.

I was raised with values. We come from a working family and so I beg you to consider my brother, as has 4 children and the dependent wife.

In advance many thanks for your attention and I remain.

Sincerely,

Alma Isavra Sonora-Barron

EXHIBIT 113 PAGE 2 OF 2

A guien corresponda.

Por medio de la presente higo constar que conosco al or. Hugo Eduardo Eduardo Eduardo Darrón - desde su infancia, en su adolescencia para ayudar a sus padres comenzó a trabajar. Si empre se a caracterizado por su trato amable y respetuoso con las — personas, es houesto, trabajador, responsable y sobre todo buén hijo que si empre a ayudado a sus padres.

Atte.

1. Justin

José de Jesus Mongola A.



#### INSTITUTO FEDERAL ELECTORAL REGISTRO FEDERAL DE ELECTORES CREDENCIAL PARA VOTAR

MUNGUIA
AFAMBULA
JOSE DE JESUS
PRANCILO
C ADOLFO LOPEZ MATEOS 200
COL ADOLFO LOPEZ MATEOS 63021
TEPIC , NAY.

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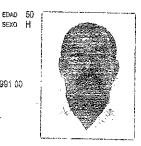
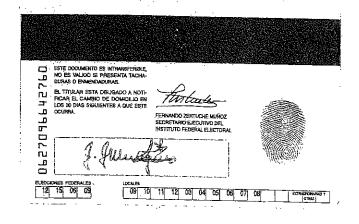


EXHIBIT 114 PAGE 1 OF 2



February 14, 2014

To whom it may concern:

by hereby state that I do know the Hugo Barron-Sonora since childhood, as idol to help their parents started working. To always characterized his dealings with people, is honest, hardworking, and mostly well responsible son who always helped his parents.

Sincerely,

Jose de Jesus Munguiz A.

EXHIBIT 114 PAGE 2 OF 2

## Tepic Nayarit 19 Febrero 2019

\* A quien Corresponda:

Por media de la presente hage constar que conozco al señor Hugo Eduardo Sonora Barrón desde hace 15 años.

Aunque no nos vemos pero siempre hemos tenido comunicación.

El es mi amigo de infancio es una persona amigable con actitud positiva siempre de superdrae y saliat adelante. El es muy respetuoso y siempre hemos contado con su apoyo.

Dies quiera que él obtenga su libertad pronto para que este con su familia esposo e hijos que tanto lo necesitan ya que son pequeños.

Esperando verlo pronto...

Por su atención

Gracias !!



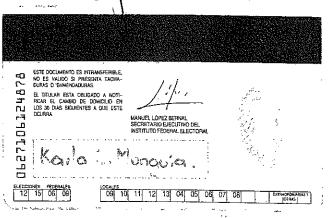
CREDENCIAL PARA VOTA

ROMBRIE
MUNGUIA
SEXO M

KARLA LORENA
LOMBICUIO
C ADOLFO LOPEZ MATEOS 200
COL ADOLFO LOPEZ MATEOS 63021
TEPIC NAY.
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Karla L. Monguia.



Through the present I certify that I know to Mr. Hugo Barron Sonora for 15 years. Although we do not see but we have always had communication.

He is my childhood friend is a friendly person with a positive attitude always overcome and come out ahead. He is very respectful and have always condones support.

God I want that for their freedom soon so I need this to your that are small.

Hoping to see you soon.

Thank you.

Karla L. Mungia

EXHIBIT 115 PAGE 2 OF 2

Tepic, Nayarit., 19 de Febrero 2014

A guien corresponda.

Vo Miriam Verenice Munquía Osana le envío esta carta, dando a conocer a su persona que conosco al Sr. Hugo Eduardo Sonara Barran desde hace 20 años.

Siendo él una persona honesta, trabajadoro y responsable. A la edad de 15 años comenzo a trabajar ya que mostroba ganas de sobre salir y valerse por sí mismo. honradomente.

Nunco tuvo problemo alguno con sus empleadores, ni con amistades ya que él siempre a sido una persono honesto, leal y corisma-tica.

En lo familiar a sido un hijo que se preocupa por el bienestor de sus padres y hermanos, buen padre y esposo.

Pido a usted reconcidere su caso a su favor gracias.



### INSTITUTO FEDERAL ELECTORAL REGISTRO FEDERAL DE ELECTORES CREDENCIAL PARA VOTAR

MUNGUIA
OSUNA
MERIAM VERENICE
DOMICIUO
C ADOLFO LOPEZ MATEOS 210
COL ADOLFO LOPEZ MATEOS 63021
TEPIC NAY.
FOLIO 0000129133020 AÑO DE REGISTRO
TAME DE ELECTOR MINOSMERS 1031518M

TEPIC NAY.
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HUNGERPO 017 LOCALIDAD 0001 SECCION 0627



Afte. Miriam Verenice Monguía Osuna.

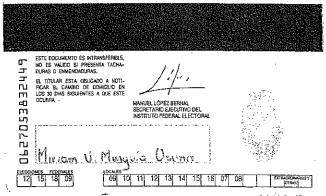


EXHIBIT 116 PAGE 1 OF 2

To whom it may concern:

And Miriam Verenice Mungia Osuna sent him this letter, announcing his person I know Mr Hugo Eduardo Barron Sonora for 20 years.

Being involved an honest and responsible person who was a hard worker. At age 15 I started working I feel like showing on leave and fend for himself honorable.

Did not ever had any problems with their employers or with friends since always been an honest person.

In the familiar to been a son who cares about the welfare of their parents and siblings, good father and husband.

I ask you reconsider your case in your favor thanks.

Thank you.

Miriam Verenice Mungia Osuna

EXHIBIT 116 PAGE 2 OF 2



# COMERCIALIZADORA DE CARNES "AGUILLO

PROP. LUIS MANUEL AGUILLON BIZARRON

Lo Mejor de Nayarit ... Siempre.

Tepic Nayant 18 Febrero 2014.

A quien corresponda;

Pormedio de la presente doy testimonio que el C. Hugo Edvardo Sonora Bando trabajo para esta empresa durante s Años demostrando capacidad laboral, lovena presentación y excelente conducta durante el tiempo que presto sus servicios con honvadez y buen compañero de trabajo.

Sin mas, porel momento y

quedando enteramente a sus ordenes.

Gloria Bizavvon de Agrillon GUERRERO NO. 448 NTE. COL SUNTA TERESTIA

TELS. 212-84-87
217-98-64 TEPIG, NAY COMERCIALIZADONA DE CARNES "AGUILLON"

EXHIBIT III PAGE 1 OF 2

P. GUERRERO No. 448 NTE. COL. SANTA TERESITA TEL. 212-84-87 y 217-98-64 TEPIC, NAYARIT. To whom it may concern:

By means of this I testify that Hugo Barron Sonora work for this company for 5 years demonstrated work ability, good presentation and excellent behavior during the time their services lent with honors and well co-worker.

No more for now and being at your service.

Thank you.

Gloria Bizarron de Aguillon



Tepic. Navarit a 18 de Febrero de 2014

## A QUIEN CORRESPONDA:

Por medio de la presente yo el C. Julián Aguillón Bonilla me permito extender esta carta para señalar que conozco al C. Hugo Eduardo Sonora Barrón como una persona Honesta, Honrada, de Buenos Sentimientos, Respetuoso y Trabajador, ya que estuvo laborando en mi Empresa alrededor de 5 Años y jamás mostro otro tipo de actitud.

Sin más por el momento me despido enviando un cordial saludo y quedo a sus órdenes para cualquier duda o aclaración.

ATENTAMENTE:

JULIAN AGULLON BONILLA

XHIBIT LE PAGE LOF

To whom it may concern:

By this I Aguillon Julian Bonilla allow me to extend this letter to point out that I know the Sonora Hugo Barron as an honest and honorable person. Good feelings, respectful and hardworking, and who was working in my company about 5 years and never showed another type of attitude.

No more for now I say goodbye sending cordial greetings and I am at your service for any questions or clarification.

Thank you.

Julian Aguillon Bonilla

EXHIBIT 118 PAGE 2 OF 2

# A quien corresponda:

Elsted de la manera més atenta, haciendole saber que mi hermono el C. Hugo Eduado Sonora Borrán, es zua persona con principios, Honesto Responsable. Trubajada desde ung Joven, dedicado a su familia: Una persona Honrada 7 de Bien: Le pido encarecidamente por que Considere a mi hermeno y prentamente puede te-greser con su familie, ya que sus 4 hijos lo necesita mucho; A todo nos hace muche falta

Agredeciendo su invuluable apopo, quedo de Moted.

Saludos Cordiales!

1750. Perla Haydee Sonora Barré

EXHIBIT 119 PAGE | OF

To whom it may concern:

Through this I am writing to you in the most courteous manner, letting you know that my brother Hugo Eduardo Barron Sonora, is a person with principle, honest, responsible, hardworking very young devoted family. An honest and good person, I ask to consider my brother and allow it so he can be back with his family, as their 4 children so much need, all we really need.

Thank you their invaluable support, is you.

Best regards.

Perla Haydee Sonora Barron

Tepic, Nay. Mêxico; a 09 de Febrero de 2014.

A quien corresponda:

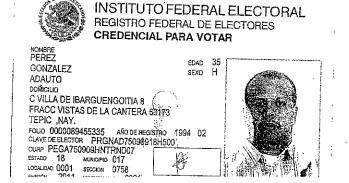
Por medio de este conducto recomiendo al señor: Hugo Eduardo Sonora Barrón, a quién conozco desde hace 14 años como una persona responsable, perseverante, paciente y muy atenta a sus obligaciones, desde su adolescencia y hasta la fecha siempre mostró ho-nestidad al trabajo, por lo que no tengo ningún inconveniente en recomendarlo ampliamente.

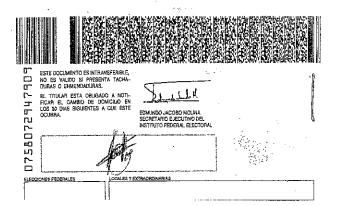
Esperando contar con una respuesta favorable a - ésta petición, quedó de usted.

ATENTAMENTE

Adauto Perker González

EXHIBIT 120 PAGE | OF 2





To whom it may concern:

By this gentleman Hugo Barron Sonora whom I've known for 14 years as a responsible, persevering, patient and very attentive to their duties, from adolescence and have the date always showed honesty to work, so no I have no hesitation in recommending widely.

Hoping to have a favorable response to this request, I am you.

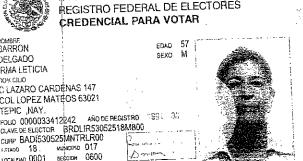
Adauto Perez Gonzalez

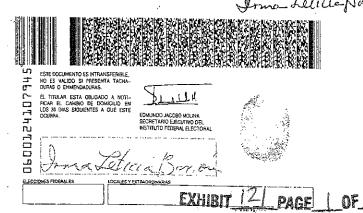
Febrero /2014-Sepic, Nayarit a Quien Corresponda., Mi nombre es Ima Leticia Bonon Delgato. Deceo expresor mis pensamiento, de Madre., Ya que mi Hijo, Hugo Etuardo Souora Borrán, Sienfr Ha sido habajador, ya que desde Cuando estaba en la frimoria, y Seciendoria Vendia Pan, Gelatino, borrea-Las Calles Por las noches, for métio del aguntamiento, del -EsTado, Para ayudor Economicamente a la casasfora el Sustento Du Papa es lo que le ensent a ser trabajador, nable, Houvad Ja Parcio, y Pora inse a los Estados Unidos a trabajor, Para ayad. nos-Siempre ha sido su Deceo afudornos, es el mas Chico de-Mis Hefor, yo estoy muy triste con depolsion evenume! for amor de Mis Hefor, yo estoy muy triste con depolsion evenume! for amor de Dior, no digo mentiras, Su fapa y yo du mama estamos dufoiento, Au. Dior, no digo mentiras, Su fapa yo du mama estamos dufoiento de Servidora. Fermanos igual Gracias por escuchorme y espero que mi Higo obtenga Su libertad.

De antemano bracias Servidora.

INSTITUTO FEDERAL ELECTORAL

MILLIAMINI MILLIAMINI DE MARIASINA DE MARIA NSTITUTO FEDERAL ELECTORAL REGISTRO FEDERAL DE ELECTORES CREDENCIAL PARA VOTAR





Teper Tragnit almera 2014

A Quien Corresponde

Mi rouche es Vision Esthe Berran Delgorlo yo Canosco a mi Salvino Heyo Educido Sans Bom desde que noies sempre a siste em leven hijo digno de Edmiros; que mi bresmoro Tormo Teteria Bonner Relyordo se siente Organtlan, ya que lesda new Fee my trobajisher, pur llago a trabajor remliento, gelativar y par per las lattr, asi Come llego a Frabajer pora el numicipio en la lempieza belos dallo de trepia Tragisity Tuckien, sin descridor Sees Estudior, de la primarie y securdarie y Carlinero Fabojardo en ema Conceria hoster sur myorie de sedoch, entregund Todo sur Espueras Came seempe. Hoste que becilie ex Torataja al Estrange Cerrary velo, tock suriede you poca denero que llevolea, por tenes en rajor porcens, y poder vonder lineso, a sur Portre " H. H. Teen beenn, prenipier morder inculade persus Podre.

Musica Esthe Brance Delgodo







vien correstand Humbert, Sovor Edes PARA PEGIR LA PRONTA LIBERACIÓN de milho HUGO Eduando SONGOLA BRARÓN Que el mes de sullo bez LYHEUE PEDEDENGE BUSEDOZU SOS 4 HOSSE MENDUESPERGE MI HUSE EDWANDE ES UNA PERSONA TRABASADORA Y HOUSTA Atentamente su seruldar

Hombets



INSTITUTO FEDERAL ELECTORAL REGISTRO FEDERAL DE ELECTORES CREDENCIAL PARA VOTAR

OCEGUEDA HUMBERTO

C LAZARO CARDENAS 147 COL LOPEZ MATEOS 63021

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